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The Secretary's Office

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March 24, 2011

Mr. David Valenstein
Division Chief, Office of Passenger and Freight Programs
Federal Railroad Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE, MS-20
Washington, DC 20590

Dear Mr. Valenstein:

The purpose of this letter is to provide you with a status update to the meeting of March 2, 2011, at which CSX Transportation, Inc. (CSXT) and the Maryland Department of Transportation (MDOT) met with you, your staff and other US DOT officials to discuss the development of an intermodal terminal in Maryland and the appropriate application of the National Environmental Policy Act (NEPA) requirements.

Since our meeting with you, CSXT provided a set of functional criteria that are necessary for the siting and operation of a rail intermodal facility in this region. MDOT staff reviewed and agrees with this information. Following your advice that functional criteria could appropriately be used to identify sites for further consideration under NEPA, CSX and MDOT applied these criteria to a list of potential locations in the Baltimore-Washington Corridor. This process resulted in the identification of four (4) sites which meet these basic requirements and which will move forward in the NEPA process. We have begun the process of informing the public and elected officials, providing briefings at the request of citizen groups and legislators, scheduling public workshops and preparing background information for release on a public website.

As mentioned in our prior correspondence, we look forward to working with you and your staff on the formal development of the purpose and need for NEPA. Attached for your information is the material describing the functional criteria that led to the list of the four candidate sites.

Thank you again for your interest in and guidance regarding this project. Please contact me regarding the next steps at (410) 865-1092 or by email at crayman@mdot.state.md.us.

Sincerely,

A handwritten signature in black ink, reading "Caitlin Hughes Rayman".

Caitlin Hughes Rayman
Assistant Secretary for Transportation Policy and Freight

My telephone number is _____
Toll Free Number 1-888-713-1414 TTY Users Call Via MD Relay
7201 Corporate Center Drive, Hanover, Maryland 21076

Mr. David Valenstein
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Attachment

cc: Ms. Catherine Dobbs, J.D., Environmental Protection Specialist, Federal Railroad
Administration
Mr. Edward Strocko, Transportation Specialist, Federal Highway Administration
Mr. Keith Brinker, Manager Environmental Remediation, CSX Transportation, Inc.
Mr. Chip Dobson, Jr., Director of Strategic Transactions, CSX Transportation, Inc.
Mr. Quintin Kendall, Regional Vice President of State Government Affairs,
CSX Transportation, Inc.
Mr. Bradley Smith, Project Manager, Office of Freight and Multimodalism, Maryland
Department of Transportation

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Introduction: The purpose of this paper is to describe the functional criteria ("the criteria") by which initially identified sites for a future Baltimore-Washington Rail Intermodal Facility (Intermodal Facility) will be screened. These functional criteria are requirements for meeting the project purpose and need. Sites that meet these initial criteria will be further evaluated as the project proceeds through the National Environmental Policy Act (NEPA) process. The functional criteria are as follows:

1. A Site located South of the Howard Street Tunnel
2. A Site with at least 70 Contiguous Acres of Usable Land for the Facility
3. A Site with Proximity and Accessibility to a Major Highway
4. A Site with the Required Shape and Configuration
5. A Site Located Adjacent to the CSX Mainline

Criteria Summaries: Specific characteristics of each of the functional criteria for site screening are described below. The descriptions present information on why each criterion is critical from an operations, safety and functional standpoint for the operation of a regional rail intermodal facility in the Baltimore-Washington corridor in Maryland. While each of these first level screening criteria are critical to the viability of a potential site, in some cases, other criteria are specific to the uniqueness of the Baltimore- Washington corridor and market. The five criteria are presented in no particular order of importance. However, meeting all five functional criteria is required for a site to be a considered a reasonable alternative.

1. **A Site located South of the Howard Street Tunnel** – Completed in 1895, the Howard Street Tunnel is a 1.7-mile long, single track tunnel located in Baltimore, Maryland that cannot accommodate double stack cargo (two containers stacked on top of one another). Double stacking is becoming the rail freight industry standard and requires a minimum of 21 feet vertical clearance. Due to utility lines and other infrastructure, modifications to the existing tunnel to achieve the required 21 feet in vertical clearance for the existing tunnel are not possible. The January 2011 USDOT report entitled *Baltimore Railroad Network: Analysis and Recommendations* estimated tunnel replacement or diversion onto one of several studied routes around Baltimore at between \$1 billion and over \$6 billion. Additionally, a new tunnel would likely take decades to plan, design, finance and construct. Whereas, an intermodal facility is approximately \$150 million to construct and can be operational by 2015. Due to these factors, the intermodal facility must be located south of the Howard Street Tunnel. This criterion has been selected so that a new intermodal facility can be linked and function in an overall system for double stack cargo. Therefore the northern limits of the site search study

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area are south of the Howard Street Tunnel and southern limits would be north of Washington, D.C. to effectively serve both the Baltimore and Washington markets.

2. **A Site with at Least 70 Contiguous Acres of Usable Land for the Facility-** A regional rail intermodal facility requires a large parcel of land or assemblage of parcels of at least 70 acres of usable land to accommodate a number of operations required for an intermodal facility. Space is needed for the lead tracks entering and exiting the facility, the support/storage tracks and the working tracks for loading and unloading freight containers; paved areas that can accommodate approximately 500 wheeled parking units and 700 stacked units/containers; as well as employee parking; operations and maintenance buildings including a check-in/check-out gate canopy; lighting and security features; and areas for stormwater management. These features, when combined, result in the need for at least 70 acres of usable land for the overall facility.
3. **A Site with Proximity and Accessibility to a Major Highway-**By definition, an intermodal facility requires efficiencies in the transfer of goods from one mode to another. For this reason, an intermodal facility in the Baltimore-Washington corridor must be sited near a major highway so that overland trucks can easily access the intermodal facility. Specifically, the major highway should have controlled access, which directs vehicles to a limited number of entrance and exit points thereby reducing conflicts and improving overall safety and mobility. Major highways offer the highest travel speeds and therefore allows the most efficient movement of truck-bound freight, which is often time sensitive. Both the major highway and connecting roadways should not prohibit the movement of intermodal truck traffic, and allow for effective truck ingress and egress to the intermodal facility. The relationship to a major highway is critical to efficiencies in the supply chain and connections to the Mid-Atlantic markets. Roadways of lower functional classification have lower speeds, generally require vehicles to negotiate multiple signalized intersections, and other physical limitations that are not conducive to the safe truck movement.
4. **A Site with the Required Shape and Configuration -** The appropriate shape and configuration of a site is critical given the horizontal and vertical requirements for freight railroads. Typical trains serving intermodal facilities are 7,500 to 10,000 feet in length, or almost two miles. The entering and exiting track lengths need to be one to two miles in length each and the site itself another mile in length, approximately. This requires that tracks must diverge from a mainline to arrive and

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depart such a facility in a manner that keeps the mainline clear for the passage of through train traffic. Additionally, because of efficiency requirements, it is essential to allow for long, straight track lengths to be able to maintain track speeds entering and leaving the facility. These factors result in the need for sites that are long and generally rectangular in shape with the long dimension parallel to the mainline. Long, linear sites provide the most efficient train movements and internal truck traffic circulation and facilitate optimum cargo handling between rail and truck. The minimum width of the site needs to be approximately 600 feet to accommodate a series of parallel track storage areas. Overall, an intermodal site including lead tracks needs to be at least three to five miles long and up to 600 feet wide.

5. **A Site located Adjacent to the CSX Mainline** - The purpose of the intermodal facility is to accommodate efficient transfer of freight between rail and truck. For this reason, a CSX intermodal facility in the Baltimore-Washington corridor needs to be adjacent to and abutting the CSX mainline. Allowing trains to move directly from the mainline to the facility, and back to the mainline in as short a time as possible is similar to typical highway rest areas that allow easy access to and from the highway. Locating the facility adjacent to the mainline minimizes interference with other freight or passenger trains or vehicles as well as eliminates the creation of isolated parcels and non-compatible land uses between the mainline and the intermodal facility. Additionally, by locating the intermodal facility along the mainline, CSX can leverage existing dedicated resources to ensure safe and efficient access into and out of the facility. Railroads typically devote most of their maintenance resources to mainlines, since those are the routes used by long-distance trains. Secondary lines are not as critical to intercity operations, and are maintained to different federal standards. This is similar to the maintenance resources dedicated to interstate highways versus those committed to neighborhood streets – all are important, but for different reasons.